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REMARKS

Claims 1-44 are pending in the present application. The Office Action mailed July 8, 2002 (hereinafter "Office Action"), rejected all pending Claims 1-44. More specifically, the Office Action rejected Claims 6 and 29 under 35 U.S.C. § 112, second paragraph, as being indefinite. The Office Action rejected Claims 1-21 and 23-43 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,493,677, issued to Balogh et al. (hereinafter "Balogh"). Applicants point out an apparent error in the Section 102(b) rejection, namely, that the rejection is based on a public use or sale of the invention. Presumably the rejection is based on the description contained in Balogh, not a public sale or use of applicants' invention. The Office Action rejected Claims 22 and 44 under 35 U.S.C. § 103(a) as being unpatentable over Balogh.

Applicants respectfully traverse the rejections set forth in the Office Action. This amendment amends Claims 1, 6, 16, 18, 21, 29, 38, and 40 for clarification purposes so that the claims more particularly point out and distinctly claim subject matter that applicants regard as being their invention. This amendment also cancels Claims 10 and 33. Upon entry of this amendment, Claims 1-9, 11-32, and 34-44 will be pending in the present application.

Prior to discussing in detail why applicants believe that all of the claims in this application are allowable, a brief description of applicants' invention and the teachings of Balogh are provided. The following discussion of the disclosed embodiments of applicants' invention and the discussion of the differences between the disclosed embodiments and the teachings of the cited and applied reference are not provided to define the scope or interpretation of any of the claims. Instead, such discussed differences are provided to help the U.S. Patent and Trademark Office better appreciate important claim distinctions discussed thereafter.

Summary of the Present Invention

The present invention is directed to a method, system, and computer-readable medium for searching a clip catalogue containing a plurality of multimedia clips based on one or more parameters of a selected clip to locate similar clips. The one or more selected parameters are defined by keywords. A clip can have a variety of keywords associated with it, including color and shape. In one form of the invention, the user chooses to locate clips based on color and shape, a thumbnail of each of the clips having a similar color scheme and shape as the selected clip is displayed.

Some embodiments of the invention also provide a user interface that allows a user easy accessibility to other functions of the multimedia applications program including the clip catalogue. Preferably, the other functions include inserting a chosen clip into a document.

playing or previewing a chosen clip, and adding a chosen clip to a category. Clips may be sorted based on categories that include several predefined topics. A user can add a clip to any desired category or categories.

As will be readily appreciated from the foregoing summary, the invention provides a search tool for searching a clip catalogue containing a plurality of multimedia clips and that allows a user to find a clip that the user will "know it when I see it." Selecting one or more desirable parameters of a selected clip defined by keywords allows a user to rapidly locate clips of like type being sought so that a final decision can be quickly reached regarding a clip to be used in, for example, a document being prepared. The present invention avoids the need to formulate complex, difficult queries.

#### Summary of the Balogh Reference

The Balogh reference generally discloses retrieving images using a natural language interface. Digitized images are associated with English language captions and other data, collectively known as the metadata associated with the images. A natural language processing database removes ambiguities from the metadata, and the images and the metadata are stored in databases. A user formulates a search query, and natural language processing is used to determine matches between the query and the stored metadata. Images corresponding to the matches are then viewed, and desired images are selected for licensing. The license terms for selected images are displayed, and a subset of the selected images are ordered as desired by the user.

In summary, Balogh discloses retrieving images using a natural language interface and English language metadata associated with the images. Balogh fails to teach or suggest causing the retrieval of keywords associated with a selected media clip from a media clip database. Balogh further fails to teach or suggest presenting the retrieved keywords. Balogh additionally fails to teach or suggest enabling a user to select search criteria based on the keywords associated with a selected media clip to retrieve all media clips in a media clip database that have matching keywords. While Balogh purportedly teaches that information inquiries are processed as in conventional keyword searching techniques (Col. 12, lines 9-11), Balogh does not disclose displaying keywords associated with a selected multimedia clip for selection by a user for subsequent searching. Only applicants' invention teaches this subject matter.

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Rejection of Claims 6 and 29 under 35 U.S.C. § 112, Second Paragraph

The Office Action rejected dependent Claims 6 and 29 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter that applicants regard as being their invention. More specifically, the Office Action states that the phrase "artistic style" is vague and indefinite.

This amendment amends Claims 6 and 29 so that they now recite that "the search criteria is a predetermined keyword." In one embodiment of the present invention, the search criteria is based on a keyword that has been predetermined to characterize the artistic style of media clips. The limitation that search criteria is a predetermined keyword is clear and definite regardless of what media clip characteristic a predetermined keyword describes and no matter how subjective the description of that characteristic may be. This is because search criteria that is a predetermined keyword is determined in advance and is thereby clearly distinguishable from search criteria that is not determined in advance. Therefore, applicants respectfully submit that, as presently amended, Claims 6 and 29 are clear, definite, and allowable. Thus, applicants respectfully request the withdrawal of the 35 U.S.C. § 112, second paragraph, rejection of Claims 6 and 29.

Rejection of Claims 1-21 and 23-43 under 35 U.S.C. § 102(b)

The Office Action rejected Claims 1-21 and 23-43 under 35 U.S.C. § 102(b) as being anticipated by Balogh. With respect to Claim 1, the Office Action states that Balogh teaches "in response to a user selecting a media clip, retrieving information associated with said selected media clip from said media clip database" because Balogh discloses a user performing an initial query resulting in retrieval of captions with images along with associated information. The Office Action states that Balogh teaches "presenting said information associated with said selected media clip" because Balogh discloses presenting the above captions, images, and information to the user. The Office Action states that Balogh teaches "in response to the user selecting a search criteria based on said information associated with said selected media clip, retrieving all media clips in said media clip database that have associated information that matches the selected search criteria for the selected media clip." The Office Action states that Balogh teaches this limitation by disclosing an additional query based upon the associated image description or bibliographical data of a previously selected image and by disclosing that the user can make further additions, deletions, and/or modifications to the associated information, if needed, prior to the additional query. The Office Action notes that Balogh discloses that a user

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drags and drops a selected image into the description or bibliographic area, resulting in transfer of associated information to be used or edited in the additional query, resulting in retrieval of additional images. Applicants respectfully disagree for the reasons discussed below.

Claim 1 Distinguished

This amendment amends Claim 1 for clarification purposes so that Claim 1 more particularly point out and distinctly claims subject matter that applicants regard as being their invention. In its presently amended form, Claim 1 reads as follows:

1. A method for searching a media clip database associated with a multimedia application program, wherein said media clip database contains information, including keywords, that describes each associated media clip in said media clip database, comprising:

in response to a user selecting a media clip, retrieving information, including keywords, associated with said selected media clip from said media clip database;

presenting said keywords associated with said selected media clip to the user for selection by the user; and

in response to the user creating search criteria by selecting one or more said keywords associated with said selected media clip, retrieving all media clips in said media clip database that have associated keywords that match the one or more keywords associated with the selected media clip selected by the user. (Emphasis added.)

Applicants respectfully disagree with the Office Action's assertion that, by disclosing a user performing an initial query that results in retrieval of captions, Balogh teaches retrieving information "in response to a user selecting a media clip." Applicants submit that retrieving information in response to performing a query is significantly different than retrieving information "in response to selecting a media clip." It is much more difficult and time consuming for a user to enter a query than it is to simply select a media clip. Balogh describes a user performing an initial query as follows:

User input is obtained concerning the type of image that the user desires. For example, a user may type a query in ordinary English, such as "red trucks". Additionally, a user may enter query data into bibliographic fields, specifying, for example, images produced by a particular artist or agency. Finally, a user may also limit a query based on image characteristics such as predominant hue or image type, as described above in connection with FIG. 6. (Balogh, Column 11, lines 60-67.)

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As quoted above, Balogh discloses the user entering a query in ordinary English or entering a structured query into particular fields, which is much more complicated for the end user than "selecting a media clip." Balogh discloses that the user must specify the query data concerning the user's desired image. However, the user may not know what search terms to specify in the query because images are difficult to describe in words. It is significantly easier and quicker for the user to select an example media clip than it is to formulate and enter a query for a desired image.

Additionally, applicants respectfully submit that Balogh fails to teach "retrieving information, including keywords, associated with said selected media clip from said media clip database," as recited in amended Claim 1. Instead, Balogh teaches a complex process of retrieving captions that best match a query as follows:

Captions that match queries are then returned 1014, ranked and displayed to the user, with those captions that match the query best being placed at the top of the list, and with matches of equal waiting being randomized so that no one of such images receives more prominent display than others time after time. The determination of whether a caption matches a query and which captions match better than others is made by the use of weights corresponding to the associations made between words and related concepts, and by weights corresponding to the number and location of matching elements. For instance, if a query includes the word "car" and a match is found based on the related concept "automobile" that would be considered a very strong match because "car" and "automobile" are synonyms. (Balogh, Column 14, lines 3-16.)

As quoted above, Balogh teaches retrieving caption information by determining the captions that best match a query based on weights corresponding to associations between words and related concepts and weights corresponding to the number and location of matching elements. In contrast, applicants' claimed invention simply and efficiently retrieves keywords from the media clip database that are associated with the selected media clip.

Furthermore, applicants respectfully submit that Balogh fails to teach "presenting said keywords associated with said selected media clip to the user for selection by the user" as recited in amended Claim 1. Rather, Balogh discloses displaying caption information, which is a short description of the salient features of an image. The caption information displayed by Balogh is very limited and confined. Displaying limited caption information is significantly different than presenting all of the keywords that are associated with a selected media clip. Associated

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keywords provide a much broader range of information than the caption information displayed by Balogh.

Another important distinction is that associated keywords are much more useful than a caption or short description are for determining search criteria to find desired media clips. The caption or short description of an image does not identify the keywords associated with the image and does not assist the user in determining what search terms to use to find a desired image. Moreover, Balogh teaches away from presenting the keywords associated with a selected media clip. Balogh states that caption information may be a set of regular English language sentences "as opposed to merely a listing of unconnected keywords." Balogh thereby teaches that displaying keywords is inferior to displaying a regular English language sentence. Natural language sentences include throwaway words such as "the," "and," "of," etc., which add nothing to search criteria. Keywords, on the other hand, avoid the use of throwaway words and provide for more efficient, concise, and focused search criteria. Only applicants' invention recognizes and teaches the significant advantages of presenting associated keywords for a selected media clip, including being simple and efficient for the user, and at the same time conveying a broad range of information highly useful as search criteria for finding similar media clips.

Applicants submit that Balogh further fails to teach, "in response to the user creating a search criteria by selecting one or more keywords associated with said selected media clip, retrieving all media clips in said media clip database that have associated keywords that match the one or more keywords associated with the selected media clip selected by the user." As the Office Action states, Balogh discloses an additional query based on the associated image description or bibliographic data of a previously selected image. Balogh also discloses that the user can make further additions, deletions, and/or modifications to the description or bibliographic data prior to said additional query. However, disclosing that a user can make additions, deletions, and/or modifications to the description or bibliographic data is not the same as teaching creating "search criteria by selecting one or more keywords associated with said selected media clip." Applicants' invention is intended to provide the user with an advantageously simple and efficient method for searching for media clips. By requiring that the search criteria be based on keywords associated with the selected media clip, applicants' claimed invention prevents the search criteria from becoming polluted with user additions, deletions, and/or modifications that would likely deteriorate the performance of the subsequent search for similar media clips. Even the manner in which Balogh teaches implementing the additional query is significantly different than applicants' claimed invention. Instead of enabling the user to

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simply and quickly "select search criteria," Balogh teaches the user dragging and dropping a selected image into a specific area of the display screen.

In view of the foregoing, applicants respectfully submit that Claim 1, as amended, is allowable. Thus, applicants respectfully request the withdrawal of the Section 102(b) rejection of Claim 1.

Claims 2-5, 7-9 and 11-15 Distinguished

Since Claims 2-5, 7-9, and 11-14 depend from independent Claim 1, the analysis discussed above with respect to Claim 1 also applies to dependent Claims 2-5, 7-9, and 11-14. Thus, applicants respectfully submit that Claims 2-5, 7-9, and 11-14 are allowable for at least the same reasons as Claim 1. Additionally, Claims 2-5, 7-9, and 11-14 recite further subject matter that is not taught or suggested by Balogh and, thus, are allowable for additional reasons.

For example, Claim 8 further adds to the novelty of Claim 1 by specifying that "the search criteria is shape." In contrast to applicants' claimed invention, Balogh discloses retrieving digital images using image metadata that is limited to bibliographic data and caption information. More specifically, the bibliographic data disclosed by Balogh is limited to artist's name, source, copyright holder, location, artist project name or series, dates, release information, and notes related to the photograph. The caption data disclosed by Balogh is limited to a short description of the image. None of the caption or bibliographic metadata disclosed by Balogh teaches or suggests shape information associated with an image. Thus, Balogh further fails to teach or suggest the subject matter recited in Claim 8.

Claim 15 recites a computer-readable medium that parallels the method recited in Claim 1. Therefore, the analysis discussed above with respect to Claim 1 also applies to Claim 15. Thus, applicants respectfully submit that Claim 15 is allowable for the same reasons as Claim 1.

Claim 16 Distinguished

This amendment amends Claim 16 to more particularly point out and distinctly claim subject matter that applicants regard as being their invention. In its presently amended form, Claim 16 recites as follows:

16. A method for providing a user interface for a visual thesaurus for a media clip database associated with a multimedia application program, wherein said media clip database contains information, *including keywords*, that describes each associated media clip in said media clip database, comprising:

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*directly* in response to a user selecting a media clip from said media clip database, displaying to the user an option for finding similar media clips that have an associated *keyword* that matches the associated *keyword* for the selected clip. (Emphasis added.)

The Office Action rejected Claim 16 under 35 U.S.C. § 102(b) as being anticipated by Balogh based on the same disclosure discussed above with respect to Claim 1. More specifically, the Office Action states that Balogh teaches retrieving information "in response to a user selecting a media clip from said media clip database" because Balogh discloses a user performing an initial query resulting in retrieval of captions with images and presenting the captions and images to a user. As discussed above with respect to Claim 1, retrieving captions in response to a user performing an initial query is not at all the same as displaying to the user an option for finding similar media clips "*directly* in response to a user selecting a media clip" from a media clip database. Again, teaching a user performing an initial query is very different than selecting a media clip.

Additionally, applicants respectfully submit that Balogh fails to teach "displaying to the user an option for finding similar media clips that have an associated *keyword* that matches the associated *keyword* for the selected clip," as recited in Claim 16. In contrast, Balogh discloses an additional query based upon the associated image caption or bibliographic data of a previously selected image. In further contrast to applicants' invention, Balogh discloses implementing the additional query by dragging and dropping a selected image into the description or bibliographic query area to transfer information to be used or edited in the additional query to retrieve additional images. The Office Action contends that the drag and drop is a visual indication of an option for finding similar media clips. However, enabling a user to perform a drag and drop operation to transfer description or bibliographic information to a query area is not at all the same as displaying an option for finding similar media clips that have an associated *keyword* that matches the associated *keyword* for the selected clip. Firstly, dragging and dropping are operations that are performed by a user and are not options that are displayed to the user. Secondly, applicants' claimed invention provides a quick and easy option for the user to find similar media clips directly in response to the user selecting the media clip and in no way involves the transfer of any information whatsoever, much less to a specific screen display query area. Thirdly, providing an additional query based on caption and bibliographic information for an image is much more limited than enabling the user to find similar media clips based on any

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keyword associated with a selected media clip regardless of whether the keyword is related to caption or bibliographic information.

In view of the foregoing, applicants respectfully submit that Claim 16, as amended, is allowable. Thus, applicants respectfully request the withdrawal of the Section 102(b) rejection of Claim 16.

Claims 17-21 Distinguished

Claims 17-21 depend from independent Claim 16. Therefore, the analysis discussed above with respect to Claim 16 also applies to dependent Claims 17-21. Thus, applicants respectfully submit that Claims 17-21 are allowable for at least the same reasons as Claim 16. Additionally, Claims 17-21 recite further subject matter that is not taught or suggested by Balogh and are allowable for additional reasons.

For example, Claim 17 adds to the novelty of Claim 16 by further providing "a graphical indication of the selected clip" and "a button for the option for finding similar clips to the selected clip." In contrast, Balogh teaches the user having to drag and drop an image into a certain query area of the display screen. Providing a button option for finding similar clips is significantly easier and quicker than the Balogh method of dragging and dropping an image to a particular display screen area in order to perform an additional query. Only applicants' claimed invention enables the user to quickly and easily find similar media clips utilizing a button option.

Claim 18 further adds to the novelty of Claim 16 the feature of "displaying means for the user to select search criteria, wherein said search criteria is based *solely* on keywords associated with said selected media clip." In contrast, Balogh teaches that the user may make additions, deletions, and/or modifications to the associated information, if needed prior to the additional query, which is significantly different than finding similar media clips based *solely* on keywords associated with the selected media clip. By displaying a means for finding similar media clips based *solely* on the selected media clips' associated keywords, applicants' claimed invention prevents the user from introducing search terms that are not associated with the selected media clip and would not be very useful for finding media clips similar to the selected media clip. Further, Balogh teaches that the additional query is in a natural language sentence form and, unlike keywords, includes throwaway words. Only applicants' invention advantageously enables the user to quickly and efficiently find similar media clips using search criteria "based *solely* on keywords associated with said selected media clip."

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Claim 19 adds to the novelty of Claim 16 by specifying that the "means for the user to select the search criteria for finding similar clips is a fly-out window." The Office Action acknowledges that Balogh fails to teach the additional subject matter recited in Claim 19, but asserts that the additional subject matter was known in the art at the time the invention was made. Applicants respectfully disagree. Even if for purposes of argument fly-out windows were known in the art at the time the invention was made, which applicants specifically deny, the combination of utilizing a fly-out window to implement a means for selecting similar clips is still not known in the art or taught by Balogh. Only applicants' claimed invention enables the user to quickly and easily select search criteria for finding similar media clips utilizing a fly-out window.

Claim 20 further adds to the novelty of Claim 16 an "option for inserting the selected clip into a document." As acknowledged in the Office Action, Balogh fails to teach or suggest any subject matter related to inserting a clip into a document. Applicants respectfully disagree with the Office Action's contention that this subject matter is known in the art. Even assuming for purposes of argument that inserting an image into a document was known in the art at the time the invention was made, it does not follow that providing this feature in combination with an option for finding similar media clips based solely on keywords associated with the selected media clip is known in the art or taught by Balogh. Only applicants' claimed invention advantageously provides a user interface that enables the user to select a media clip, find similar clips based solely on keywords associated with the selected media clip *and* insert the selected media clip into a document.

Claim 24 Distinguished

This amendment amends independent Claim 24 similarly to independent Claim 1. In its presently amended form, Claim 24 reads as follows:

24. (Twice Amended) An apparatus for searching a plurality of media clips, comprising:

- (a) a processing unit; and
- (b) a storage medium coupled to the processing unit, the storage medium storing program code implemented by the processing unit for:
  - (i) providing an interface for a user to select a media clip from a media clip database associated with a multimedia application program, wherein

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said media clip database contains information, *including keywords*, that describes each associated media clip in said media clip database;

(ii) providing an interface for the user to select search criteria based on *keywords* associated with said selected media clip; and

(iii) in response to the user selecting the media clip and the search criteria, retrieving all media clips in the media clip database that have an associated *keyword* that matches the selected search criteria for the selected media clip. (Emphasis added.)

The Office Action rejected Claim 24 under 35 U.S.C. § 102(b) as being anticipated by Balogh based on nearly the same disclosure discussed above with respect to Claim 1. Applicants respectfully submit that Claim 24 is not anticipated by Balogh for the same reasons discussed above with respect to Claim 1. As discussed above with respect to Claim 1, Balogh discloses the user performing an initial query, which is not at all the same as teaching the user selecting a media clip. Further, applicants' invention does not require the user to drag and drop an image into a certain area of the screen to transfer information about an image into an area of the screen for a type of query. Additionally, Balogh teaches that the user may make additions, deletions, and/or modifications to the associated information, if needed prior to the additional query, which is significantly different than "providing an interface for the user to select search criteria based on *keywords* associated with said selected media clip." Applicants' invention provides a simple and effective way for a user to retrieve all media clips in the media clip database that have an associated keyword that matches the selected search criteria for the selected media clip.

In view of the foregoing, applicants respectfully submit that Claim 24 is allowable. Thus, applicants respectfully request the withdrawal of the Section 102(b) rejection of Claim 24.

Claims 25-28, 30-32 and 34-37 Distinguished

Claims 25-28, 30-32, and 34-37 depend from independent Claim 24. Therefore, the analysis discussed above with respect to Claim 24 also applies to dependent Claims 25-28, 30-32, and 34-37. Thus, applicants respectfully submit that Claims 25-28, 30-32, and 34-37 are allowable for at least the same reasons as Claim 24. Additionally, Claims 25-28, 30-32, and 34-37 recite further subject matter that is not taught or suggested by Balogh and thus are allowable for additional reasons.

For example, Claim 31 further recites an apparatus wherein "the search criteria is shape." As discussed above with respect to Claim 8, Balogh fails to teach or suggest any search criteria

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that is related to the shape of a selected media clip. In contrast, Balogh discloses retrieving digital images using image metadata that is limited to bibliographic data and caption information. None of the caption or bibliographic metadata disclosed by Balogh teaches or suggests shape information associated with an image. Thus, Balogh further fails to teach or suggest the subject matter recited in Claim 31.

Claim 38 Distinguished

Claim 38 recites an apparatus that somewhat parallels the method of Claim 16. This amendment amends Claim 38 similarly to the way Claim 16 was amended, as discussed above. The Office Action rejected Claim 38 under 35 U.S.C. § 102(b) as being anticipated by Balogh based on nearly the same disclosure discussed above with respect to Claim 16. Applicants respectfully submit that Claim 38 is allowable for the same reasons discussed above with respect to Claim 16. Thus, applicants respectfully request the withdrawal of the Section 102(b) rejection of Claim 38.

Claims 39-43 Distinguished

Claims 39-43 depend from Claim 38. Therefore, the analysis discussed above with respect to Claim 38 also applies to Claims 39-44. Thus, applicants respectfully submit that Claims 39-44 are allowable for at least the same reasons as Claim 38. Additionally, Claims 39-44 recite further subject matter that is not taught or suggested by Balogh and, thus, are allowable for additional reasons.

Claims 39-43 recite an apparatus that parallels the methods recited in Claims 17-21, respectively. As discussed above, Claims 17-21 recite additional subject matter not taught or suggested by Balogh. Therefore, applicants submit that Claims 39-43 are allowable for the same additional reasons that were discussed above with regard to Claims 17-21, respectively.

Rejection of Claims 22 and 44 under 35 U.S.C. § 103(a)

The Office Action rejected Claims 22 and 44 under 35 U.S.C. § 103(a) as being unpatentable in view of Balogh. In rejecting Claims 22 and 44 under 35 U.S.C. § 103(a) as being unpatentable over Balogh, the Office Action acknowledged that Balogh does not teach "an option to add a clip to a category." However, the Office Action states that this limitation would have been obvious to one of ordinary skill in the art at the time of the invention in view of Balogh because Balogh teaches ordering selected images through a purchase/delivery service. The Office Action states that Balogh discloses that images are selected by the user for purchase,

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which the Office Action states is the same as the user voluntarily adding a media clip to a category intended for purchase. The Office Action concludes that adapting Balogh to incorporate user inclusion of clips into various additional categories as taught by Balogh provides a user of Balogh the benefit of grouping selected images for further action (i.e., negotiation, reservation, trade, etc.). Applicants respectfully disagree for the reasons discussed below.

Claims 22 and 44 depend from independent Claims 16 and 38, respectively. Therefore, the analysis discussed above with respect to Claims 16 and 38 also applies to dependent Claims 22 and 44, respectively. Thus, applicants respectfully submit that Claims 22 and 44 are allowable for at least the same reasons as Claims 16 and 38. Additionally, Claims 22 and 44 recited further subject matter not taught or suggested by Balogh and are allowable for this additional reason.

More specifically, Claims 16 and 38 add to the novelty of Claims 16 and 38 by further providing "displaying to the user an option to add the clip to one or more categories." As the Office Action acknowledges, Balogh is limited to disclosing that the user may select an image to purchase. Selecting an image to purchase is entirely unrelated to "adding a clip to one or more categories." Nowhere, in the cited portions or elsewhere, does Balogh even remotely suggest an image category, much less provide the user with an option for adding a clip to one or more categories. The subject matter recited in Claims 22 and 44 is taught only by the present application. The rejection is using hindsight reasoning based on the present disclosure to "produce" the claimed invention. The references do not suggest the manner, much less the matter recited, in applicants' claims.

Applicants respectfully submit that Claims 22 and 44 are allowable. Nothing in Balogh teaches or suggests "an option to add the clip to one or more categories." The modification to Balogh and the motivation for modifying Balogh identified by the Office Action certainly does not make applicants' invention obvious. Balogh fails to suggest "an option for adding a clip to a category" simply because Balogh discloses selecting a clip to be purchased. Therefore, Balogh further fails to teach or suggest the additional subject matter recited in Claims 22 and 44.

#### CONCLUSION

In view of the foregoing, applicants respectfully submit that Claims 1-9, 11-32, and 34-44 are allowable over the cited and applied references, alone or in combination. Reconsideration and reexamination of the application are requested and allowance of the rejected claims and

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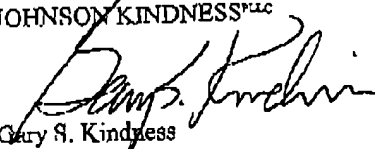
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passage of the application to issue at an early date are solicited. If the Examiner has any questions or comments concerning this application, he is invited to contact the applicant's undersigned attorney at the number set forth below.

Respectfully submitted,

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I hereby certify that this correspondence is being transmitted via facsimile to the U.S. Patent and Trademark Office, Group Art Unit 2176, Examiner William Bashorr, at facsimile number 703.746.7238 on October 28, 2002.

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In the Claims:

1. (Twice Amended) A method for searching a media clip database associated with a multimedia application program, wherein said media clip database contains information, including keywords, that describes each associated media clip in said media clip database, comprising:
- in response to a user selecting a media clip, retrieving information, including keywords associated with said selected media clip from said media clip database;
- presenting said [information] keywords associated with said selected media clip to the user for selection by the user; and
- in response to the user [selecting] creating search criteria [based on said information] by selecting one or more of said keywords associated with said selected media clip, retrieving all media clips in said media clip database that have associated [information] keywords that [matches the selected search criteria for the selected media clip] match the one or more keywords associated with the selected media clip selected by the user.
6. (Amended) The method of Claim 1, wherein the search criteria is a predetermined keyword [artistic style].
16. (Twice Amended) A method for providing a user interface for a visual thesaurus for a media clip database associated with a multimedia application program, wherein said media clip database contains information, including keywords, that describes each associated media clip in said media clip database, comprising:
- directly in response to a user selecting a media clip from said media clip database, displaying to the user an option for finding similar media clips that have an associated [information] keyword that matches the associated [information] keyword for the selected clip.
18. (Twice Amended) The method of Claim 16, further comprising, in response to a user selecting the option for finding similar clips, displaying means for the user to select search criteria for finding similar clips, wherein said search criteria is based solely on [information] keywords associated with said selected clip.
24. (Twice Amended) An apparatus for searching a plurality of media clips, comprising:



(a) a processing unit; and  
(b) a storage medium coupled to the processing unit, the storage medium storing program code implemented by the processing unit for:

(i) providing an interface for a user to select a media clip from a media clip database associated with a multimedia application program, wherein said media clip database contains information, including keywords, that describes each associated media clip in said media clip database;

(ii) providing an interface for the user to select search criteria based on [information] keywords associated with said selected media clip; and

(iii) in response to the user selecting the media clip and the search criteria, retrieving all media clips in the media clip database that have an associated [information] keyword that matches the selected search criteria for the selected media clip.

29. (Amended) The apparatus of Claim 24, wherein the search criteria is a predetermined keyword [artistic style].

38. (Twice Amended) An apparatus for providing a user interface for a visual thesaurus for a media clip database associated with a multimedia application program, wherein the media clip database contains information, including keywords, that describes each associated media clip in said media clip database, comprising:

(a) a processing unit; and

(b) a storage medium coupled to the processing unit, the storage medium storing program code implemented by the processing unit for displaying to a user an option for finding similar media clips that have associated [information] keywords that [matches] match the associated [information] keywords for a selected media clip, directly in response to the user selecting the media clip.

40. (Twice Amended) The apparatus of Claim 38, wherein the program code displays means for a user to select search criteria is based solely on [information] keywords associated with said selected clip for finding similar clips, in response to the user selecting the option for finding similar clips.

Claims 10 and 33 have been canceled.

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